

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
No. 3:21-cv-191

DANIEL RUFTY LEGAL, PLLC, d/b/a  
Carolina Legal Services,

Plaintiff,

v.

JASON BLUST, LAW OFFICE OF JASON  
BLUST, LLC, LIT DEF STRATEGIES,  
LLC, and RELIALIT, LLC,

Defendants.

**DECLARATION OF JASON BLUST IN SUPPORT OF DEFENDANT JASON BLUST,  
LAW OFFICE OF JASON BLUST, LLC, LIT DEF STRATEGIES, LLC, AND  
RELIALIT, LLC'S MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION**

I, Jason Blust, being competent to testify and having personal knowledge of the matters stated herein, declare as follows:

1. I am a citizen and resident of the state of Illinois who lives in Lake Barrington, Illinois.
2. I am the sole member and manager of the Law Office of Jason Blust, LLC ("LOJB"), the manager of Lit Def Strategies, LLC ("Lit Def"), and the sole member and manager of Relialit LLC ("Relialit"). I have personal knowledge of certain facts regarding LOJB, Lit Def, and Relialit, relevant to this proceeding.

**Jason Blust**

3. I have lived in Illinois for my entire life. I have only visited North Carolina between 5 and 10 times and each visit was for personal reasons.

4. I own no property in North Carolina; I pay no taxes in the State of North Carolina.

5. Regarding the allegations and persons named in the Complaint filed against me in this matter, I have only met Meg Sohmer Wood, in person, on one occasion. She came to visit the office of LOJB, located at 211 W. Wacker Dr., Suite 300, in Chicago, Illinois, in January or February of 2018. I have only met Daniel Rufty, in person, on two occasions. He came to Chicago to visit the office of LOJB on or about October 30, 2019 and we met in the state of New York on another occasion. I never met with Ms. Wood or Mr. Rufty in the State of North Carolina.

6. All of my other contacts with Ms. Wood or Mr. Rufty were via telephone or email, from my residence and/or office in Illinois.

**LOJB**

7. LOJB is a limited liability company organized and existing under the laws of Illinois with its principal place of business in Chicago, Illinois. It was formed in 2013 and I am the sole member and manager.

8. LOJB is not registered to do business in North Carolina, nor has it authorized anyone or any entity in North Carolina to accept service of process on its behalf.

9. LOJB neither has offices in nor owns real property in North Carolina.

10. LOJB has no employees in North Carolina. Accordingly, it pays no salary to anyone in North Carolina.

11. LOJB does not advertise or solicit business in North Carolina.

12. LOJB does not have any financial accounts located in North Carolina.

13. LOJB does not own any assets in North Carolina.
14. LOJB does not pay taxes to the State of North Carolina.

**Relialit**

15. Relialit is a limited liability company organized and existing under the laws of Illinois with its principal place of business in Chicago, Illinois. I am its sole member and manager. It was formed in February 2019 and is currently not in operation. I am in the process of winding it down.

16. Relialit is not registered to do business in North Carolina, nor has it authorized anyone or any entity in North Carolina to accept service of process on its behalf.

17. Relialit neither has offices in nor owns real property in North Carolina.

18. Relialit has no employees in North Carolina. Accordingly, it pays no salary to anyone in North Carolina.

19. Relialit does not advertise in North Carolina.

20. Relialit does not have any financial accounts located in North Carolina.

21. Relialit does not own any assets in North Carolina.

22. Relialit does not pay taxes to the State of North Carolina.

23. Relialit did not make in-person contact in North Carolina with a resident of North Carolina regarding a business relationship.

24. Relialit has no current business dealings in North Carolina.

***Lit Def***

25. Lit Def is a limited liability company organized and existing under the laws of Illinois with its principal place of business in Chicago, Illinois. I am its manager. It is solely owned by a separate entity that has no interest or relationship to North Carolina.

26. Lit Def is not registered to do business in North Carolina, nor has it authorized anyone or any entity in North Carolina to accept service of process on its behalf.

27. Lit Def neither has offices in nor owns real property in North Carolina.

28. Lit Def has no employees in North Carolina. Accordingly, it pays no salary to anyone in North Carolina.

29. Lit Def does not advertise in North Carolina.


30. Lit Def does not have any financial accounts located in North Carolina.

31. Lit Def does not own any assets in North Carolina.

32. Lit Def does not pay taxes to the State of North Carolina.

33. Lit Def did not make in-person contact in North Carolina with a resident of North Carolina regarding a business relationship.

I declare under penalty of perjury that the foregoing is true and correct on this the 29th day of June, 2021.

  
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Jason Blust